

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE

Dr. Regina Jordan-Sodiq,
Plaintiff

v.

State of Tennessee et.al., Defendant
Shoe Carnival Defendant

Case No.: 3:25-CV-00288
Judge Eli Richardson Jury Demand

**PLAINTIFF'S AMENDED RESPONSE IN OPPOSITION TO DEFENDANT
SHOE CARNIVAL'S REPLY TO ITS MOTION TO DISMISS**

COMES NOW Plaintiff, Dr. Regina Jordan-Sodiq, and submits this response opposing Defendant Shoe Carnival's Reply to its Motion to Dismiss under Federal Rules of Civil Procedure 12(b)(5) and 12(b)(6).

I. OBJECTION TO DISMISSAL WITH PREJUDICE

1. Defendant Shoe Carnival **seeks dismissal with prejudice**, arguing that Plaintiff improperly introduced new allegations in her Response to the Motion to Dismiss.
2. However, courts recognize that **clarifications or factual expansions in opposition filings** are not "new claims" but part of a broader factual basis supporting existing pleadings.
3. If any procedural concerns remain, **Plaintiff requests leave to amend** under Rule 15(a)(2), ensuring fairness before any final dismissal is granted.

II. PLAINTIFF'S RESPONSE COMPLIES WITH LOCAL RULE 7.01(a)(3)

4. Defendant incorrectly asserts that Plaintiff's Response fails to rebut their motion effectively; however, Plaintiff's filing was timely and substantively addresses Defendant's dismissal arguments.
5. Plaintiff has outlined clear legal reasoning, refuted Defendant's objections under Rules 12(b)(5) and 12(b)(6), and provided exhibits supporting procedural compliance.

III. DEFENDING THE VALIDITY OF CLAIMS UNDER RULE 12(b)(6)

6. Defendant seeks dismissal for **failure to state a claim**, attempting to discredit Plaintiff's allegations of psychological coercion and emotional distress.
7. However, existing case law **recognizes undue influence, coercion, and reckless disregard for emotional harm as legally actionable offenses**—Plaintiff's claims meet established legal thresholds.

8. If ambiguity exists, **Plaintiff requests judicial intervention for discovery**, preventing premature dismissal of valid claims.

IV. PROVING PROPER SERVICE UNDER RULE 12(b)(5)

9. Defendant challenges service, asserting that neither **CT Corporation Systems (their registered agent)** nor their **legal counsel** received proper service.
10. Plaintiff provides **proof of service**, including USPS confirmation receipts and tracking details, confirming diligent efforts. Exhibit A: USPS confirmation receipt #9410 8301 0935 5003 6271 12 and Exhibit B : USPS confirmation receipt #9410 8301 0935 5003 7407 98 served to both their legal counsel and registered agent.
11. If Defendant disputes CT Corporation Systems' role, **they must formally disclose their correct registered agent** instead of evading service under technicalities.

V. REQUEST FOR DISCLOSURE OF HEARING DATE

12. Defendant has failed to provide Plaintiff with a **scheduled hearing date** for its pending Motion to Dismiss, obstructing procedural fairness.
13. Plaintiff formally requests **judicial intervention to compel disclosure** of the hearing date and prevent unnecessary delays.

VI. REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court:

- **Deny Defendant's Motion to Dismiss with Prejudice**, ensuring Plaintiff retains the right to amend if necessary.
- **Compel Defendant to disclose the hearing date and time**, preventing further procedural obstruction.
- **Require Defendant to confirm its registered agent's full name and address**, ensuring proper service.
- **Grant any further relief deemed just and equitable.**

CERTIFICATE OF SERVICE

I hereby certify that on this ^{5th}~~4th~~ day of May, 2025, a true and correct copy of Plaintiff's Response in Opposition to Defendants' Motion to Dismiss and Motion to Compel Disclosure of Hearing Date and Registered Agent Information, along with accompanying exhibits, was served via electronic filing upon the following:

Defendants' Counsel: Stanley M. Ross and Tracy P. Knight email: sross@mrrlegal.com

Pursuant to the Tennessee Rules of Civil Procedure, electronic service of this filing is deemed proper and effective.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

Dr

Reina Jordan-Sodig
Plaintiff(s),

Case Number 3:25-CV-00288

v.

State of Tennessee et al.,
Defendant(s). and Shoe Carnival
Defendant

Judge Judge Eli Richardson
Jury Demand
Magistrate Judge _____

Response to Motion to Dismiss
(Type of Pleading)

Exhibits: ① Exhibit A: USPS confirmation receipt

9410 8301 0935 5003 6271 12

② Exhibit B USPS confirmation receipt

9410 8301 0935 5003 7407 98

①

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)
has been served on:

Response to Motion to
Dismiss

(Name)
(Address)
(Address)

Kimberly S. Seirs
214 Church Street
Suite 300, Nashville TN 37203

(Name)
(Address)
(Address)

Catherine R. Rogers
222 Second Ave South, Suite 2000
Nashville TN 37201

(Name)
(Address)
(Address)

Stanley Mitchell Moss
309 4th St
Clarksville TN 37040

(Name)
(Address)
(Address)

Vason W. Colton
701 Gates LLP
701 Commerce Street
Suite 1500, Nashville TN 37203

(Name)
(Address)
(Address)

Tracey P. Knight
308 5th Street
Clarksville TN 37040

(Name)
(Address)
(Address)

Christopher Manning
Rudor Sauer LLP Nashville Building
1320 Adams St, Suite 1400
Nashville TN 37203

(Name)
(Address)
(Address)

Kirrah Jordan Mason
600 Peachtree Street, NE, Suite 300
Atlanta GA 30308

(Name)
(Address)
(Address)

John H. Dollarhide
Duties Snow LLP
1500 2nd Avenue South Suite 1600
Nashville TN 37201

(Name)
(Address)
(Address)

Colie William Schott
3170 West End Ave Suite 1100
Nashville TN 37203

on the day of

24
Signature

Continue -

2

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)
has been served on:

(Name)

Mr. Scott Sims

(Address)

3102 West End Avenue, Suite 1100

(Address)

Memphis TN 38203

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

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(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

on the 5th day of May

2025

[Signature]
Signature

(3)

DR

(Signature)

REGINA JORDAN SEDIG
(Print Name)

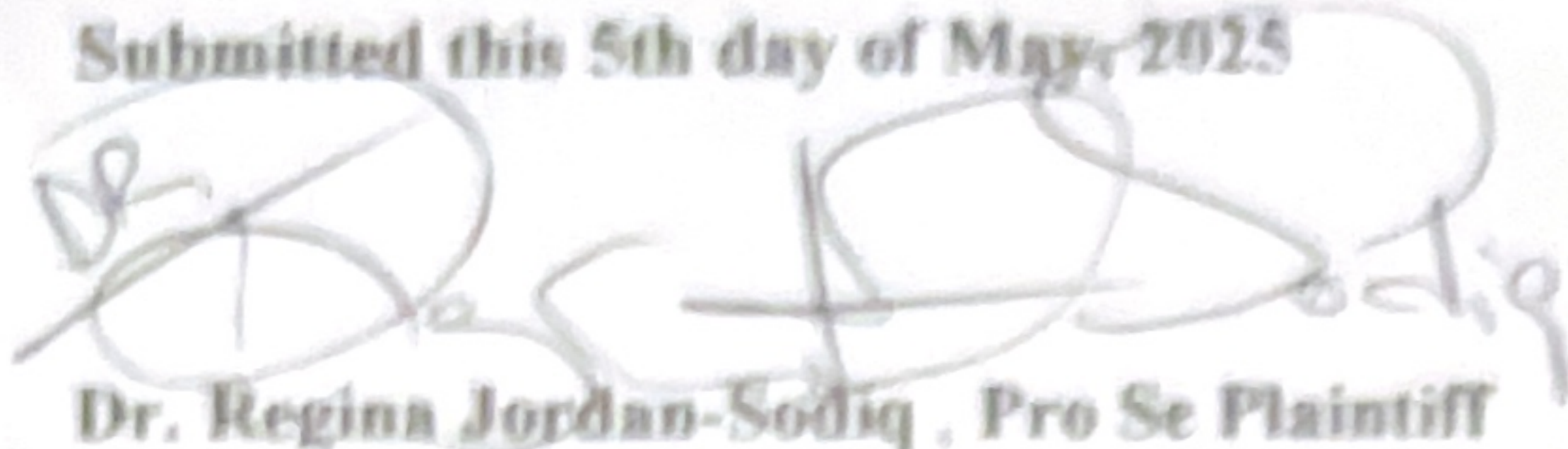
1757 Autumnwood Blvd

Clarksville TN 37042

(931) 561-2546
(Address & Telephone Number, if any)

(4)

Submitted this 5th day of May, 2025

A handwritten signature in black ink, appearing to read 'Dr. Regina Jordan-Sodiq', written over the typed name.

Dr. Regina Jordan-Sodiq, Pro Se Plaintiff
1757 Autumnwood Blvd Clarksville, TN 37042

Instructions

1. Please use a laser or laser-quality printer.
2. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secure. Self-adhesive label is recommended.
3. Place label so that it does not wrap around the edge of the package.
4. Each shipping label number is unique and can be used only once - DO NOT PHOTOCOPY.
5. Please use this shipping label on the "ship date" selected when you requested the label.
6. If a mailing receipt is required, present the article and Online e-Label Record at a Post Office for postmark.

9410 8301 0935 5003 7407 98

Print Date: 2025-04-22	PRIORITY MAIL®	\$8.75
Ship Date: 2025-04-22	Extra Services:	\$3.70
	Fees:	<u>\$0.00</u>
	Total:	\$12.45

From: REGINA JORDAN-SODIQ
1757 AUTUMNWOOD BLVD
CLARKSVILLE TN 37042-1713

To: CT CORPORATION SYSTEM (REGISTERED AGENT)
TRACY P KNIGHT
300 MONTVUE RD
KNOXVILLE TN 37919-5510

* Commercial Pricing PRIORITY MAIL® rates apply. There is no fee for USPS Tracking® service on PRIORITY MAIL® service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.



Thank you for shipping with the United States Postal Service!
Check the status of your shipment on the USPS Tracking® page at usps.com

Cut on dotted line.

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9410 8301 0935 5003 6271 12

Print Date: 2025-04-15	PRIORITY MAIL®	\$8.75
Ship Date: 2025-04-15	Extra Services:	\$3.70
	Fees:	<u>\$0.00</u>
	Total:	\$12.45

From: REGINA JORDAN-SODIQ
1757 AUTUMNWOOD BLVD
CLARKSVILLE TN 37042-1713

To: C/O TRACEY P KNIGHT MITCHELL ROSS ROCCO
STANLEY M ROSS
308 S 2ND ST
CLARKSVILLE TN 37040-3632

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Exhibit A

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Ship Date: 2025-04-15

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STANLEY M ROSS
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CLARKSVILLE TN 37040-3632

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Exhibit B

9410 8301 0935 5003 7407 98

Print Date: 2025-04-22

Ship Date: 2025-04-22

PRIORITY MAIL®	\$8.75
Extra Services:	\$3.70
Fees:	<u>\$0.00</u>
Total:	\$12.45

From: REGINA JORDAN-SODIQ
1757 AUTUMNWOOD BLVD
CLARKSVILLE TN 37042-1713

To: CT CORPORATION SYSTEM (REGISTERED AGENT)
TRACY P KNIGHT
300 MONTVUE RD
KNOXVILLE TN 37919-5510

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